

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE TREMONT SECURITIES LAW,	:	Master File No.:
STATE LAW AND INSURANCE	:	08 Civ. 11117 (TPG)
LITIGATION	:	
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This Document Relates to: All Actions	:	
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**DECLARATION OF RICHARD G. HADDAD IN OPPOSITION TO  
MOTION FOR APPROVAL OF FUND DISTRIBUTION ACCOUNT  
PLAN OF ALLOCATION, DISTRIBUTION PROCEDURES,  
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

Richard G. Haddad, an attorney duly admitted to practice law in the State of New York and this Court, declares under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the Firm of Otterbourg P.C., which represents Philadelphia Financial Life Assurance Company ("PFLAC") in these actions.
2. I submit this Declaration in Opposition to the Motion for Approval of Fund Distribution Plan of Allocation, Distribution Procedures, Attorneys' Fees and Reimbursement of Expenses (ECF Nos. 1088-91).
3. Attached hereto as Exhibit "A" is true and correct copy of a spreadsheet received by PFLAC from Tremont's counsel that purports to analyze the aggregate investments made by the individual PFLAC policyholders in various Rye and Tremont funds, but does not reflect the separate account records maintained and distributed by Tremont for those individual policyholders. PFLAC does not admit that Exhibit "A" is accurate.

4. Attached hereto as Exhibit “B” is a true and correct copy of a letter from Seth M. Schwartz, Esq., of Skadden, Arps, Slate, Meagher & Flom LLP to Susan M. Oberlies, Esq., of PFLAC dated March 11, 2011.

5. Attached hereto as Exhibit “C” is a copy of the Supplemental Joint Declaration of Andrew Entwistle, Reed R. Kathrein and Jeffrey M. Haber in Further Support of the Plans of Allocation filed on May 25, 2011 (ECF No. 514).

6. Attached hereto as Exhibit “D” are true and correct copies of certain Customer Claims of Rye Select Broad Market Prime Fund, L.P., Rye Select Broad Market Insurance Portfolio, LDC, Rye Select Broad Market Insurance Fund L.P., and Rye Select Broad Market Portfolio Limited, and Rye Select Broad Market Fund, L.P. (without exhibits) in the SIPA proceeding with respect to Bernard L. Madoff Investment Securities, LLC.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
August 10, 2015

/s/ Richard G. Haddad  
Richard G. Haddad